## LAW OFFICES OF

## STEPHEN TURANO

sturano@turanolaw.com

275 MADISON AVENUE 35<sup>TH</sup> FLOOR NEW YORK, NY 10016 60 PARK PLACE SUITE 703 NEWARK, NJ 07102

TEL (917) 974-1781 FAX (212) 208-2981 TEL (973) 648-6777 FAX (212) 208-2981

REPLY TO NEW JERSEY OFFICE

September 18, 2020

By ECF

cc:

The Honorable Katherine Polk Failla United States District Judge Southern District of New York 40 Foley Square New York, NY 1007 Application granted.

SO ORDERED.

Re: United States v. Tujuan Ford,

17 Cr. 449 (KPF)

Ronnie Abrams, U.S.D.J.

September 18, 2020

Dear Judge Polk Failla:

I represent Tujuan Ford in the above-referenced matter, whose sentence is scheduled for October 30, 2020. As the Court is aware, Mr. Ford participated in the SDNY Young Adult Opportunity Program (the "YAOP"). Unfortunately, he was arrested on state charges (which have not yet been adjudicated) and recently terminated from YAOP.

Although I recently conferred with the Government and stated my willingness to proceed with sentencing, I have since spoken with my client's mother and received information that may be relevant for mitigation of his sentence and require, among other things, retrieval of medical records. Under separate application, I intend to request the appointment of a mitigation specialist, who will need additional time to assist me.

Therefore, I request an adjournment of Mr. Ford's sentencing to a date in mid-December.

Respectfully submitted,

/s/ Stephen Turano Stephen Turano Attorney for Tujuan Ford

Counsel for the Government (by ECF)